

REMARKS

This Response is submitted in reply to the non-final Office Action dated July 24, 2006. Claims 15-29 are pending in the present application. With this Response, no claims have been amended, and no new matter has been introduced. Thus, reconsideration is respectfully requested.

I. Response To §103 Rejections

Claims 15, 17, 21-22 and 24-29 stand rejected under 35 U.S.C. §103(a) as being anticipated by Miller et al. (U.S. Patent No. 6,535,911, hereafter "Miller") in view of Krishnan et al. (U.S. Patent No. 6,075,863, hereafter "Krishnan"). Claims 16, 18-19 and 23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Miller and Krishnan, and further in view of Lueh (U.S. Publication No. 2002/0144240, hereafter "Lueh"). The Applicant respectfully traverses these rejections.

The cited references (alone or in combination) fail to teach or suggest the following features recited in at least independent claims 15 and 21. First, "a system data processor for performing at least one telecommunication activity, the at least one telecommunication activity being exclusively limited to at least one of creating, setting up, implementing, monitoring and terminating a telecommunication connection with the wireless mobile communication network." Second, "a control data processor that is logically separated from the system data processor, the control data processor automatically executing at least one control instruction sequence stored in the telecommunication module, the at least one control instruction sequence being implemented such that, upon execution, the at least one telecommunication activity is initiated." Finally, "a connector for further connecting the control data processor to an external electronic device."

Miller is directed to a system and method for maintaining an updated version of information originated from a distribution media. In particular, Miller teaches a general purpose computer (155) that is connected to a server (105) for updating distribution media file systems (see, Miller, Abstract and Fig. 1). As correctly noted by the Examiner, Miller is silent with regard to at least the recited "control data processor that is logically separated from the system data processor" and the "connector for further connecting the control data processor to an external electronic device" (see, Office Action, pages 2-3).

Although the Examiner relies on Krishnan for overcoming the deficiencies noted above in Miller, this reference still appears to fall short of the present invention. Krishnan is directed to a communication device that is controlled through the use of small programs or applets, which are executed by a processor within the device. In particular, a modem 10 is controlled using the programs or applets that are executed by the processor 18 in the modem 10. The programs or applets can be loaded into the modem 10 from a host computer 12 that is connected to the modem 10 via an external port 16. The modem 10 is also provided with a jack 26 for coupling to a telephone line 14 (see, Krishnan, Fig. 1).

In the Office Action, the Examiner interprets the host computer 12 as the claimed "system data processor," and the processor 18 as the claimed "control data processor." However, in the present invention, the system data processor in the telecommunication module is used for performing at least one telecommunication activity with a wireless mobile communication network. Conversely, in Krishnan, there is only one processor 18 in the modem 10, and that processor 18 is used for connecting to a telephone line 14. Thus, Krishnan fails to teach or suggest "a direct connection to a wireless mobile communication network," as claimed.

Moreover, in the present invention, the telecommunication module includes a control data processor that is logically separated from the system data processor. Conversely, the modem 10 only includes one processor 18. Although the Examiner attempts to interpret the host computer 12 as equivalent to the claimed system data processor, this interpretation appears erroneous. As claimed, the telecommunication module include two processors (i.e., a system data processor and a control data processor). On the other hand, in Krishnan, the host computer 12 is clearly not part of the modem 10. Moreover, even if the host computer 12 were part of the modem 10, Krishnan provides no hint that the host computer 12 performs "at least one telecommunication activity being exclusively limited to at least one of creating, setting up, implementing, monitoring and terminating a telecommunication connection with the wireless mobile communication network," as claimed. Thus, Krishnan fails to teach or suggest all the features of the claimed system data processor and control data processor.

Finally, the telecommunication module of the present invention includes a connector for further connecting the control data processor to an external electronic device. In the Office Action, the Examiner interprets the host computer 12 also as the external device. However, as

noted previously, the Examiner also interpreted the host computer 12 as equivalent to the system data processor, which (as claimed) is a subcomponent of the telecommunication module (i.e., modem 10). Thus, given the Examiner's interpretation of the host computer 12 (i.e., a subcomponent of the modem 10), the host computer 12 can not be "an external electronic device," as claimed.

In summary, neither Miller nor Krishnan teach or suggest a telecommunication module that includes a system data processor and a control data processor, let alone a system data processor and a control data processor performing all the features recited in at least independent claims 15 and 21. Additionally, since Miller is directed to updating information sets and Krishnan is directed to modems, one of ordinary skill in the art would not be motivated to combine or modify their teachings to arrive at the present invention. Finally, Lueh fails to overcome the deficiencies noted above in Miller and Krishnan. Thus, even if one of ordinary skill in the art were to combine the teachings of Miller, Krishnan and Lueh, the combination still does not teach or suggest all the features recited in at least independent claims 15 and 21.

Accordingly, independent claims 15 and 21 are distinguished over the cited references for at least the reasons noted above. Likewise, dependent claims 16-19 and 22-29 are also distinguished from the cited references based on their dependency from independent claims 15 and 21.

II. Conclusion

Based on the foregoing, the Applicant respectfully requests withdrawal of the claim rejections and allowance of the application. If there are any additional fees that are due in connection with this application as a whole, the Director is authorized to deduct those fees from Deposit Account No. 02-1818. If such a deduction is made, please indicate Attorney Docket No. 0112740-1019 on the account statement.

Respectfully submitted,

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